

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BARBARA PECK, on behalf of herself and
others similarly situated,

Plaintiff,

v.

MOEN INCORPORATED,

Defendant.

Case No. 1:22-cv-02123

Judge David A Ruiz

JOINT STATUS REPORT

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Plaintiff Barbara Peck and Defendant Moen Incorporated file this joint status report pursuant to the Court's November 1, 2023 Order adopting the Parties' Stipulation For Issuance of Collective Action Notice and Joint Motion for Approval of Form of Notice, ECF No. 21, directing the parties to confer and file a joint status report with the Court as to the status of the case following the issuance of the Notice.

1. Based on the number of individuals who have filed consents to opt-in to the instant case, Plaintiff is now in a position to convey an initial settlement demand to Defendant. The Parties believe discussing an amicable resolution may be fruitful at this juncture of the case.

2. Before submitting a discovery plan and engaging in discovery efforts, the parties request a stay for a period of 90 days for the purposes of negotiating a non-litigated resolution to this case.

3. Good cause exists for a brief stay for period of 90 days and a brief stay will not prejudice any party. A stay will only support the Parties' efforts to resolve this matter by allowing the parties' to delay costs and attorneys' fees associated with engaging in discovery.

WHEREFORE, Barbara Peck and Defendant Moen Incorporated request that the Court stay discovery in this case for 90 days, up to and including May 22, 2024, to allow the Parties to attempt to negotiate a non-litigated resolution to this matter. The Parties further request that the Court order the parties to confer and file a joint report with the Court as to the status of those efforts on or by May 22, 2024.

Respectfully Submitted on February 22, 2024.

BARBARA PECK

/s/Christopher J. Lalak

Christopher J. Lalak
Lalak LLC
1991 Crocker Road, Suite 600-748
Westlake, OH 44145
(440) 724-5236
clalak@employmentlawohio.com

Counsel for Plaintiff

MOEN INCORPORATED

/s/ Christina Jaremus

Noah A. Finkel (*admitted pro hac vice*)
Christina Jaremus (*admitted pro hac vice*)
Seyfarth Shaw LLP
233 South Wacker Drive, Suite 8000
Chicago, IL 60606
(312) 460-5000
nfinkel@seyfarth.com
cjaremus@seyfarth.com

Brian Kelly
Frantz Ward LLP
200 Public Square, Suite 3000
Cleveland, OH 44114
(216) 515-1620
bkelly@frantzward.com

Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that on February 22, 2024, the foregoing was filed electronically with the Court. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Christina Jaremus

Christina Jaremus